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February 24, 2021

Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722

Re: McDowall et al. v. ILKB LLC, et. al.
Docket Number: 2:20-cv-06171-GRB-AKT

Dear Judge Brown:

This office represents the plaintiffs, Roddie McDowall, Teresa Hatter McDowall and Transcending Future Legacies, LLC, in the above referenced matter.

As defense counsel stated in his earlier correspondence, we had a lengthy phone conversation with defense counsel regarding this matter, and we have essentially agreed to the following:

1. Plaintiff is going to be amending their Complaint to add a new party, therefore making the current pre-motion letter requesting a pre motion conference for Defendant's anticipated Motion to Dismiss under Rules 9(b) and 12(b)(2)-(3), and (6) moot.
2. Plaintiff and Defendants would like to stipulate to extend defendants time to Answer the Plaintiff's Complaint until May 1, 2021, so that the new Defendants can be brought into the case, and so that we can explore settlement negotiations with all defendants.

We thank you for your kind consideration of the foregoing.

Respectfully submitted,

Peter D. Baron, Esq

PDB/jrb

cc: Peter Siachos, Esq. (VIA ECF)